

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

VALERIO LOPEZ, *et al.*,

*

Plaintiffs,

*

v.

*

Civil Action No.: 8:08-cv-01579-DKC

NTI, LLC, *et al.*

*

Defendants.

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* * * * *

PLAINTIFF’S MOTION TO ENFORCE ORAL SETTLEMENT AGREEMENT

Plaintiffs¹ hereby file this Motion to Enforce the Oral Settlement Agreement entered into by Defendants, XTEL Construction Group, LLC and Mike Bahmani, (collectively referred to as “Defendants”), and Plaintiffs, and to seek an award of Plaintiffs’ attorneys’ fees and costs in connection with the filing of this Motion. During a telephone conference on February 17, 2011, before the Honorable Judge Grimm, Plaintiffs and Defendants entered into a binding oral settlement agreement. On March 17, 2011, when the written memorialization of the agreement was due to the Judge, Defendant Bahmani reneged on the settlement agreement. Plaintiffs respectfully request this Honorable Court to grant Plaintiff’s Motion to Enforce Oral Settlement Agreement.

The reasons that this Honorable Court should grant this Motion are set forth in greater detail in the following Supporting Memorandum of Law.

¹ For clarity, this Motion refers to Plaintiffs and Claimants in this action collectively as “Plaintiffs.” Valerio Lopez, Carlos Garcia Valle, and Oscar Pineda, with others no longer a party to this lawsuit, filed their Complaint against Defendants XTEL Construction Group, LLC and Mike Bahmani, and others no longer a party to this lawsuit, on June 17, 2008. Claimants Virgillio Dominguez Gomez, Juan Pineda Gonzales, Marvin Mejia, Jose Santos Melgar, Jesus Orellana, Victor Perez, Josue Roberto Pineda, Nery Armando Pineda, Guadalupe Diaz Ortiz, and Rafael Amaya joined as claimants pursuant to 29 U.S.C. § 216(b).

Respectfully Submitted,

_____/s/_____
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